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Federal Communications Commission

445 12th, Street SW

Washington, DC 20554

May 23, 2012

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Advancing Broadband Availability Through	)	
Digital Literacy Training	)	WC Docket No. 12-23

Dear Sir/Madame:

I am writing today in response to the FCC's Notice of Proposed Rulemaking related to digital literacy and digital literacy training courses. Firstly, the City of Chicago and partners commends the FCC's commitment to funding digital literacy programs and its consideration of use of the Universal Service Fund's Lifeline program to support digital literacy programs.

The City of Chicago and partners encourages the Commission to support existing digital literacy programs in general and BTOP programs in particular and to consider the importance of community anchor institutions and the role they play in the success of a digital literacy program.

The City of Chicago and its partners are recipients of both a BTOP Sustainable Broadband Adoption (SBA) grant and a Public Computer Centers (PCC) grant, which together total over $15 million in federal funds and over $5 million in matching funds.

The Smart Communities program, the City's comprehensive and in-depth digital literacy program, is funded by a federal BTOP SBA Grant and aims to build a culture of technology use and digital excellence in five low-and-moderate-income community areas in Chicago. The program is an ambitious one, with multiple organizations and activities. Demand for training was higher than anticipated, and waiting lists formed at the computer centers as they began to offer classes in late 2010. Smart Communities is an accomplished digital literacy training project whose funding will expire in early 2013 and is in need of additional resources.

The City has completed an academic, formative evaluation of our digital literacy program, and it suggests that our Smart Communities program works well because digital literacy training was implemented in ways that were responsive to a community's self-defined needs and that reflect a high level of trust between teachers and program participants—especially immigrant populations. The institutions that provide the most effective digital literacy training in Chicago are multi-purpose facilities that house additional support community programs or are based at a community anchor institution. The majority of our digital literacy work takes place at job-training and assistance centers that also house community technology centers. Additionally, we have found that digital literacy training in Spanish in immigrant population neighborhoods is another key component for success. What matters is that these community-embedded institutions are places where members of the community feel safe to experiment with technology in a non-threatening, supportive environment.

BTOP supported training programs face a challenge – the need for sustained funding to support their efforts going forward. ARRA provides support for these projects currently, but that support will end in Chicago 2013. In order to continue providing the services on which members of our communities rely, these projects need new, viable options for sustainability.

The City of Chicago and its partners question whether monetary support for digital literacy training efforts through a Eligible Telecommunications Carrier (ETC) is compatible with our understanding of how successful digital literacy efforts work, and the City of Chicago and its partners suggest that the FCC strongly consider supporting successful and existing digital literacy BTOP programs.

Providing funding to established and successful programs is more likely to advance broadband adoption than start-up programs run by ETCs that have not demonstrated a track record of success. Funding existing BTOP programs to provide digital literacy training versus a range of ETCs can ensure that Commission-led digital training efforts best meet the needs of local communities. Schools, libraries, community-service centers, public housing projects, and

neighborhood community development organizations are particularly well-suited to deliver digital literacy training to their own community members.

The FCC's proposed digital literacy program should be designed both to support projects like those in BTOP and to provide a mechanism for continued support to BTOP projects.

These comments are being filed in the above-referenced dockets for inclusion in the public record.

Respectfully submitted,

/s/ Francesca Rodriquez

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